



RHODE ISLAND

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

**COMMENT LETTER**

October 4, 2017

**Corrective Measures Implementation**

File No. SR-07-0255

Formerly Case No. 2000-044

Joseph Guarnaccia, EHS Remediation Specialist  
BASF Corporation  
100 Park Avenue  
Florham Park, New Jersey 07932

RE: Corrective Measures Implementation-Volume I and II  
Ciba-Geigy facility  
180 Mill Street  
Cranston, Rhode Island  
Plat Map 4 / Lot 1102

Dear Mr. Guarnaccia:

The Rhode Island Department of Environmental Management's (the Department) Office of Waste Management (OWM) has reviewed the Corrective Measures Implementation Volume I and II for the above referenced property (the Site), which was submitted on September 11, 2017, by AEI Consultants in accordance with the Department's Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations).

After careful review of the **Corrective Measures Implementation Volume I and II** (for Lot 1102), the Department requires a response to the attached comments, questions, and concerns about the submittal, which must be fully addressed in writing to receive a Remedial Approval Letter.

If you have any questions regarding this letter or would like the opportunity to meet with Department personnel, please contact me by telephone at (401) 222-2797, ext. 7102, or by E-mail at [jeff.crawford@dem.ri.gov](mailto:jeff.crawford@dem.ri.gov).

Sincerely,

Jeffrey Crawford, Project Manager  
Principal Environmental Scientist  
Office of Waste Management



cc: Kelly Owens, Supervising Engineer  
Charles Horbert, Supervisor, DEM Wetlands Permitting  
Frank Battaglia, USEPA Region 1 Corrective Action Program  
Kim Tisa, USEPA Region 1 PCB Coordinator

Ciba-Geigy  
Corrective Measures Implementation  
Lot 1102, 180 Mill Street, Cranston RI  
Volume I and Volume II

**Comments:**

1. AEI Consultants and BASF are reminded that revisions and or modifications to the proposed Work Plan for capping of Lot 1102 may be required pending the outcome of comments or permitting required from USEPA Region 1 and/or the Department's Wetlands Section review.
2. Page 3- General Comment- Please copy the Office of Waste Management on all correspondence with the Department's Wetlands Program and any submission of a Preliminary Determination request concerning whether the Lot 1102 remedy is a significant alteration or insignificant alteration.
3. Page 3- The Department assumes that this is temporary fencing under the last bullet.
4. Page 11- Given the higher concentrations of PCBs discovered at TP-5, please explain if this material will be segregated into a separate waste soil pile as highly contaminated as compared to the other lower concentration PCB contaminated soils which are to be disposed of at an offsite licensed hazardous waste disposal facility.
5. Page 15- Under Section 3.1, please included the Department's Rules and Regulations for Governing the Administration and Enforcement of the Freshwater Wetlands Act (7/16/2014).
6. Any concrete or concrete slabs removed and proposed for crushing and reuse on site, must be thoroughly cleaned in a self-contained area and tested prior to reuse.
7. Any contaminated soils or materials must be properly handled and disposed within 90 days of generation. Copies of all disposal documentation (including but not limited to HW manifests, bills of landing and any other transportation and disposal receipts) must be included in the Closure Report.
8. Page 32- Closure of the Groundwater Treatment system will require DEM written approval.
9. Appendix A- General Information: What level of Personnel Protection is being required during the soil removal and disposal activities in the areas where PCB's were greater than 500 ppm?
10. Please explain if there is a location on the property where large stain impacted concrete sections are going to be cleaned or are they going to be strictly live loaded into disposal trucks or dumpsters for offsite disposal?

11. BASF is reminded that any properties which are being remediated for purposes of transfer or sale must be identified to the Department 30 days in advance of transfer and/or sale (Rule 10.03) along with the purchasers contact information. If potential purchasers are looking to participate in the Voluntary Party program, written notification must be made well in advance of any transfer or sale. Parcel's requiring an Environmental Land Use Restriction (ELUR) must be reviewed and approved by RIDEM and then recorded in the City of Cranston Land Evidence Records (with copy of recording back to RIDEM) prior to issuance of the Letter of Compliance and property transfer.
12. Upon completion of all remediation and closure reports for this site, the Department reminds BASF to contact the City of Cranston, Public Works Department about any scheduled activities within the ELUR area require 48-hour notice to RIDEM.